



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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SFUND RECORDS CTR
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AUG 17 1988

MEMORANDUM

SUBJECT: Review of the Proposed Remedial Action Plan,
Ordot Landfill, Guam

FROM: Melvin Okawa, Drinking Water Branch *Mel Okawa*

TO: Lead Reviewer, OGW

The Proposed Remedial Action Plan (PRAP) for the Ordot Landfill in Guam was reviewed for Applicable or Relevant and Appropriate Requirements (ARARs) which may affect the drinking water program. The following comments are made:

- 1) The contractor concludes that the no-action alternative is preferred even though the sampling program was limited (only 13 samples were collected for leachate, surface, and ground water). It does not seem reasonable to conclude that the no-action alternative is preferred based on such a limited sampling program especially where single samples are collected.
- 2) On page 16, reference is made to table 5-1 of the endangerment assessment where comparison of potential ARARs are made. For drinking water, the ARARs are the MCLs. Other values are criteria to be considered. It is stated that barium and zinc are well below applicable MCLs. However, only barium has an existing MCL. A secondary MCL only exists for zinc. On page 18 of the conclusions, it is stated that iron and maganese exceed their respective ARARs. This statement is not technically correct since the ARARs alluded to here are the secondary MCLs which are not drinking water ARARs.
- 3) In general, the information in the PRAP is too sketchy to adequately assess whether drinking water ARARs are adequately addressed at the site.

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